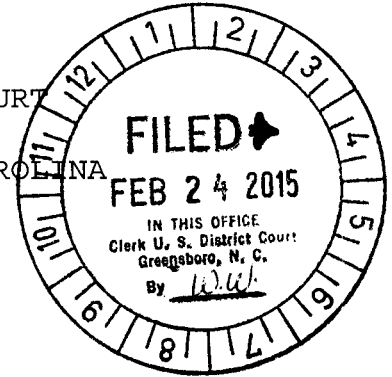


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA

v.

ELIAZAR GUZMAN DOMINGUEZ,
also known as "Chi"
OSCAR PAZ MENDOZA
OSCAR SILVA MARTINEZ
JESUS ALFREDO ROCHIN,
also known as "Gordo"
JAMIL JUMMA SALEHANI
IRMA ALVARADO ROMAN,
also known as Irma Alverado
Roman
EFRAINE CHANELO FLORES
ENEDINO RUIZ GONZALEZ,
also known as Javier Ruiz
Maldonado, Baltazar Noyola
Gonzalez, and "Balta"
EDWARD THOMAS MARIN
MAURICIO MILIAN RAMOS
JHOVANI LOPEZ PALACIOS

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The Grand Jury charges:

COUNT ONE

From in or about August, 2014, continuing up to and including on or about September 29, 2014, the exact dates to the Grand Jurors unknown, in the County of Forsyth, in the Middle District of North Carolina, and elsewhere, ELIAZAR GUZMAN DOMINGUEZ, also known as "Chi," OSCAR PAZ MENDOZA, OSCAR SILVA MARTINEZ, JESUS ALFREDO ROCHIN, also known as "Gordo,"

JAMIL JUMMA SALEHANI, IRMA ALVARADO ROMAN, also known as Irma Alverado Roman, EFRAINE CHANELO FLORES, ENEDINO RUIZ GONZALEZ, also known as Javier Ruiz Maldonado, Baltazar Noyola Gonzalez, and "Balta," EDWARD THOMAS MARIN, MAURICIO MILIAN RAMOS, JHOVANI LOPEZ PALACIOS, and divers other persons, known and unknown to the Grand Jurors, knowingly and intentionally did unlawfully conspire, combine, confederate and agree together and with each other to commit offenses against the laws of the United States, that is:

To knowingly, intentionally and unlawfully distribute a mixture and substance containing a detectable amount of cocaine hydrochloride, a Schedule II, controlled substance within the meaning of Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(C).

COUNT TWO

From in or about August, 2014, continuing up to and including on or about September 29, 2014, the exact dates to the Grand Jurors unknown, in the County of Forsyth, in the Middle District of North Carolina, and elsewhere, JAMIL JUMMA SALEHANI, and divers other persons, known and unknown to the Grand Jurors, knowingly and intentionally did unlawfully conspire, combine,

confederate and agree together and with each other to commit offenses against the laws of the United States, that is:

To knowingly conduct and cause to be conducted financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of said specified unlawful activity, and that while conducting and causing to be conducted such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

COUNT THREE

On or about September 29, 2014, in the County of Forsyth, in the Middle District of North Carolina, ELIAZAR GUZMAN DOMINGUEZ, also known as "Chi," an alien who had previously been deported and removed from the United States on or about March 31, 2009, thereafter was found in the United States at Winston-Salem, North Carolina, said defendant having not obtained the consent of the Attorney General of the United States or his

successor, the Secretary of Homeland Security, to reapply for admission into the United States; in violation of Title 8, United States Code, Section 1326(a).

COUNT FOUR

On or about September 29, 2014, in the County of Forsyth, in the Middle District of North Carolina, ENEDINO RUIZ GONZALEZ, also known as Javier Ruiz Maldonado, Baltazar Noyola Gonzalez, and "Balta," an alien who had previously been deported and removed from the United States on or about November 4, 2008, and whose removal was subsequent to conviction for the commission of an aggravated felony, thereafter was found in the United States at Winston-Salem, North Carolina, said defendant having not obtained the consent of the Attorney General of the United States or his successor, the Secretary for Homeland Security, to reapply for admission into the United States; in violation of Title 8, United States Code, Section 1326(a) and (b)(2).

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts One and Two of the Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Upon conviction of one or more of the offenses alleged in Count One of the Indictment, the defendants, JAMIL JUMMA

SALEHANI and IRMA ALVARADO ROMAN, also known as Irma Alverado Roman, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), the following:

- (1) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such violation; and
- (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

3. Upon conviction of one or more of the offenses alleged in Count Two of the Indictment, the defendant, JAMIL JUMMA SALEHANI, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property.

4. The property to be forfeited includes, but is not limited to, the following:

A. Personal Property

All right, title, and interest of defendant JAMIL JUMMA SALEHANI in and to the miscellaneous items of jewelry seized from the premises of New York Jewelry, located in Winston-Salem, North Carolina, on or about September 29, 2014, with a total estimated appraised value of \$462,642.79.

B. Real Property

All right, title, and interest of defendant IRMA ALVARADO ROMAN, also known as Irma Alverado Roman, in and to the following real properties:

1) 2112 Old Lexington Road

All that certain lot or parcel of land known as 2112 Old Lexington Road, Winston-Salem, Forsyth County, North Carolina, owned by defendant IRMA ALVERADO ROMAN, also known as Irma Alverado Roman, and spouse, pursuant to a deed recorded at Book 2207, Pages 2175-2176 of the Forsyth County Registry, and more particularly described as follows:

Beginning at an iron stake on the West side of Old Lexington Road, the Southeast corner of a lot purchased by Roy Setzer and wife (Deed Book 409, Page 171 and plat Book 8, Page 174) and running thence along the West side of said road, South 25 feet to a stake; thence north 75 degs., 30 min. West 132.6 feet to a stake; thence North 14 deg. 30 min. East 89 feet to a stake in the South line of Junia Avenue; thence South 75 deg. 30 min. East along the South side of said avenue 8 feet to a point; thence South 14 deg. 30 min West 64 feet to the North side of the large portion of this tract; thence South 76 deg. 30 min. East 128.6 feet to the place of BEGINNING. Being known and designated as Lots 103 and 211, Block 730 of the Forsyth County Tax Maps and being composed of 4 separate tracts as deed to C. A. Swaney and wife in Deed Book 472, page 61, 528, page 259, 538, page 318, and 810, page 417 and being owned by Mr. and Mrs. C. A. Swaney until their deaths in 1966 and 1987 respectively and now owned by their daughter Mary Ann Swaney Bunn. See Ex. files 6176 and 6409.

2) 2253 Marble Street

All that certain lot or parcel of land known as 2253 Marble Street, Winston-Salem, Forsyth County, North Carolina, owned by defendant IRMA ALVERADO ROMAN, also known as Irma Alverado Roman, and J.R.G., pursuant to a deed recorded at Book 2790, Page 490 of the Forsyth County Registry, and more particularly described as follows:

BEING KNOWN AND DESIGNATED as Lot 2 on a Map of J. F. Brendle Property, as set forth in Plat Book 6 at page 59, in the office of the Register of Deeds of Forsyth County, North Carolina, reference to which is hereby made for a more particular description.

Block lot #1273 002

Home built in 1927

2253 Marble St Winston Salem NC 27107, County of Forsyth

2478 living sq. ft. land Acreage of 0.25

Pin #6844-45-2317

Map Number 642842

3) 1513 Waughtown Street

All that certain lot or parcel of land known as 1513 Waughtown Street, Winston-Salem, Forsyth County, North Carolina, owned by defendant IRMA ALVERADO ROMAN, also known as Irma Alverado Roman, and J.R., pursuant to a deed recorded at Book 2151, Page 3243 of the Forsyth County Registry, and more particularly described as follows:

BEGINNING at an iron stake on the north side of Waughtown Street, being 102.90 feet East of the northeast intersection of Waughtown Street and Pleasant Street; thence North 00 deg. 39' East 65.2 feet to an iron stake; thence South 01 deg. 30' East 164.70 feet to an iron stake in the north line of Waughtown Street; thence along the north line of Waughtown Street South 87 deg. 49' West 67.7 feet to the iron stake, the place of BEGINNING.

5. If any of the property described above, as a result of any act or omission of the defendant:

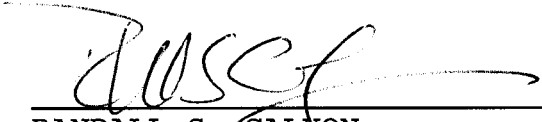
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

then the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 21, United States Code, Section 853 and Title 28, United States Code, Section 2461(c).

All in accordance with Title 21, United States Code,
Section 853, and Rule 32.2(a), Federal Rules of Criminal
Procedure.

A TRUE BILL:

FOREPERSON



RANDALL S. GALYON
ASSISTANT UNITED STATES ATTORNEY

RIPLEY RAND
UNITED STATES ATTORNEY